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Attorneys for Defendants The United States Chess Federation,
 Joel Channing, William Goichberg, Bill Hall, Herbert Rodney Vaughn,
 Gregory Alexander, Grant Perks, Randall Hough, Randy Bauer, Paul Truong,
 Susan Polgar and Jim Berry

**UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK**

	x	
	:	
SAM SLOAN,	:	
	:	
Plaintiff,	:	Civil Action No. 07-CV-8537 (DC)
	:	
vs.	:	
	:	
HOAINHAN "PAUL" TRUONG, ZSUZSANNA	:	AFFIDAVIT OF JEREMY M.
"SUSAN" POLGAR, JOEL CHANNING,	:	<u>BROWN, ESQ.</u>
WILLIAM GOICHBERG, THE UNITED STATES	:	
CHESS FEDERATION, BILL HALL, HERBERT	:	
RODNEY VAUGHN, GREGORY ALEXANDER,	:	Document Filed Electronically
FRANK NIRO, GRANT PERKS, WILLIAM	:	
BROCK, RANDALL HOUGH, RANDY BAUER,	:	
JIM BERRY, TEXAS TECH UNIVERSITY and	:	
UNITED STATES OF AMERICA	:	
	:	
Defendants.	:	
	:	
	x	

JEREMY M. BROWN, being duly sworn, deposes and states:

1. I am senior counsel with the law firm of Proskauer rose LLP, attorneys for defendants The United States Chess Federation, Joel Channing, William Goichberg, Bill Hall, Herbert Rodney Vaughn, Gregory Alexander, Grant Perks, Randall Hough, Randy Bauer, Paul Truong,

Susan Polgar and Jim Berry (hereinafter "Defendants"), in this action. This Affidavit is filed in support of Defendants' Motion to Dismiss Plaintiff's Complaint with prejudice pursuant to Rules 12(b)(1) and 12(b)(2) of the Federal Rules of Civil Procedure.

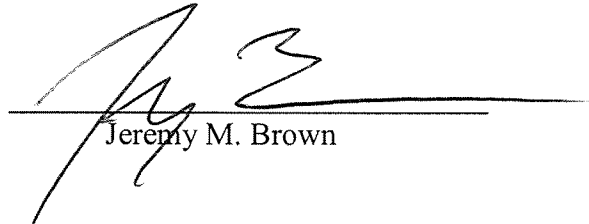
2. Attached as Exhibit A is a true and correct copy of the Complaint in this matter.

3. Defendant Herbert Rodney Vaughn reports that he was not served with the Complaint.


4. Defendants Gregory Alexander, a resident of Washington State, and Grant Perks, a resident of the State of Ohio, report that they were served with a copy of the Complaint via regular mail only.

5. I have been unable to locate Defendant Frank Niro and Plaintiff has acknowledged to me via a telephone conversation that he does not know Niro's address or location.

I declare under penalty of perjury that the foregoing is true and correct.


Jeremy M. Brown

Sworn to before me this
4th Day of January, 2008.


Notary Public

LINDA NICHOLAS
Notary Public, State of New Jersey
No. 2055150
Qualified in Passaic County
Commission Expires Feb. 23, 2008

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Sam Sloan,

Plaintiff,

-against-

Hoainhan "Paul" Truong, Zsuzsanna "Susan" Polgar, Joel Channing, William Goichberg, The United States Chess Federation, Bill Hall, Herbert Rodney Vaughn, Gregory Alexander, Frank Niro, Grant Perks, William Brock, Randall Hough, Randy Bauer, Jim Berry, Texas Tech University and United States of America,

Defendants

VERIFIED COMPLAINT

Samuel H. Sloan, the plaintiff herein, being duly sworn, deposes and says:

1. This action is brought to redress identity theft, impersonation, election fraud, accounting fraud, insider self-dealing and other insider wrong-doing in connection with the United States Chess Federation.
2. Jurisdiction is based on diversity of citizenship, federal questions, election fraud and the constitution and laws of the United States. The amount in controversy exceeds \$75,000.
3. Defendants Hoainhan "Paul" Truong ("Truong") and Zsuzsanna "Susan" Polgar ("Polgar"), a married couple living together, have for more than two years engaged in violations of 47 USC §223(h)(1) by sending over the Internet thousands of obscene messages likely to be read by children while disguising their identities by impersonating Plaintiff and other well known chess personalities. They have sent or transmitted more than three thousand Internet postings under the name of "Sam Sloan". These postings have become known in the World Chess Community as "Fake Sam Sloan postings". They have also posted as "Ray Gordon" (a publisher of a series of books on how to seduce women) and these have become known as "Fake Ray Gordon Postings". They have also posted as a variety of real or anonymous personalities including Beatriz Marinello, Stan Booz, "Jackass Lafferty", JudgementDay, Bob Bennett and many others.
4. Truong and Polgar have made these fake Internet postings while running as candidates for election to the Executive Board of the United States Chess Federation. Their purpose in impersonating primarily Sam Sloan but others as well has been to get themselves and their slate of candidates elected so as to take control of the United States Chess Federation and its finances. Most of the postings by the Fake Sam Sloan are obscene, pornographic and defamatory attacks on other chess personalities. Thus, both Sloan and the subjects of these attacks are all victims. The United States Chess Federation has

approximately 86,000 members and \$3.2 million in annual revenues. Truong and Polgar have engaged in a wide-ranging disinformation campaign to discredit their rivals, to win election and to get their hands on the money. During the recently concluded election campaign, Polgar accused a rival candidate of being a homosexual pedophile with a history of soliciting boys playing in chess tournaments he directed for sex. Polgar and Truong have often accused Beatriz Marinello, a member of the USCF Scholastic Council and a former USCF President, of being a lesbian. (Marinello says that she is not a lesbian, that she has been married twice and is currently married.)

5. The postings impersonating Plaintiff, known as the "Fake Sam Sloan postings", have been on Internet newsgroups rec.games.chess.politics and rec.games.chess.misc. These groups are carried on a wide variety of Internet servers, are broadcast around the world with tens of thousands of readers and are permanently kept and preserved. Here are some recent examples of the postings by Polgar and Truong:

Subject: Sam Sloan soliciting 8 year old girls Date: Wed, 19 Sep 2007 09:01:43 -0700

Subject: Actions against a child rapist Sam Sloan Date: Fri, 14 Sep 2007 06:16:03 -0700

Subject: Re: Brian Lafferty replaces Sam Sloan as the biggest dickhead Date: Sun, 16 Sep 2007 21:30:20 -0700

Subject: Attorney Brian Lafferty is a horse's ass Date: Wed, 12 Sep 2007 15:03:31 -0700

Subject: Re: Fucking lying scumbag Brian Lafferty Date: Tue, 11 Sep 2007 20:42:22 -0000

Subject: Actions against Sam Sloan for molesting children Date: Sun, 09 Sep 2007 20:41:01 -0700

Subject: Sam Sloan whines like a pig on a stick Date: Sun, 09 Sep 2007 05:55:15 -0700

Subject: Sam went down on a 12 year old Japanese girl Date: Thu, 06 Sep 2007 08:18:42 -0700

6. All of the above are just a few quick examples of the more than three thousand Internet postings by Polgar and Truong since June, 2005. These postings are likely to be read by children, since the average USCF member is ten years old. Although they appear all to be by or against Sam Sloan, it has been proven through IP addresses that all of the above postings were by Polgar and Truong. As Truong and Polgar have moved around from place to place, the IP address of the Fake Sam Sloan has moved with them. When they went to Hungary, the Fake Sam Sloan stopped posting until they returned. When they recently got jobs as faculty members of Texas Tech University in Lubbock, Texas, the Fake Sam Sloan also started posting from the university computers at Texas Tech University. Then, when last week they went to Mexico City for the World Chess Championship, the Fake Sam Sloan also started posting from Mexico City. Just as criminals are often caught by a simple slip-up and mistake, Polgar and Truong were finally caught and positively identified by website administrator Brian Mottershead when they logged in and posted as the Fake Sam Sloan, the Fake Ray Gordon and then themselves under their real names from the same computer first at Texas Tech University and later at Mexico City. From Mexico City, they posted from NNTP-Posting-Host: 201.134.236.150 on September 25, 2007, and from the same computer logged into the USCF Forums. This constitutes proof positive that both the Fake Sam Sloan and the Fake Ray Gordon plus "Jackass Laffety", judgementday@clerk.com and a host of others

are all Polgar and Truong.

7. Prior to the start of this dis-information campaign, Sam Sloan enjoyed a sterling reputation as an investigative reporter and was held in the highest regard by the World Chess Community. Polgar and Truong on the other hand had a bad reputation and were known collectively by the euphemism of "Trollgar". (See also for example former US Women's Champion Jennifer Shahade's acclaimed book "Chess Bitch" in which she refers to them as "Trulgar" on page 105.) During the recently concluded election campaign, Bill Goichberg mailed 17,000 (seventeen thousand) postcards to USCF voting members falsely accusing Plaintiff of wide-ranging wrong doing, and urging in the strongest possible terms that the voters vote against Sloan. Goichberg also put up a new website at <http://www.checkmate.us> to specifically attack Sloan. This combined with the three thousand obscene postings by the Fake Sam Sloan, now proven to be by Polgar and Truong, have poisoned the well and will make a new election difficult to conduct fairly.

8. The Fake Sam Sloan first started posting on exactly June 25, 2005 when plaintiff was up in the air flying from New York to Chicago to play his famous grudge match with Bill Brock. Since then, there have been more than three thousand postings by the Fake Sam Sloan. The purpose of these thousands of Internet postings impersonating Sloan and others was to win election and to gain control of the financial assets and revenues of the United States Chess Federation. They succeeded by winning the election in a mail-in ballot in which the votes were counted on July 27, 2007. Polgar and Truong won the election in a field of ten candidates and were elected to four year terms. However, one of the candidates on their slate, Mikhail Korenman, was defeated and thus they have only three votes on a seven member board. Their group includes Joel Channing who is a fellow Polgarista. One member of their slate, Randy Bauer, defected after winning election and has consistently voted against them. The defeated candidates include incumbent board members Don Schultz (a former USCF President) and Sam Sloan. Because they only have three votes, Susan Polgar was unable to get herself elected as President of the USCF and had no choice but to accept the honorary title of "Chairman of the USCF", an unofficial position with no powers or duties. Truong accepted an unofficial position of VP of Marketing and Public Relations.

9. This action seeks to set aside the election on the grounds of massive election fraud and other irregularities as set forth more fully below. Plaintiff seeks the reinstatement of the three board members who lost their seats on the recent election, who were Sam Sloan, Don Schultz and Beatriz Marinello, until a new election is held and that a new election be held at the earliest practicable date, to be supervised by the Department of Justice (and for this reason the United States of America is named as a defendant). Plaintiff seeks a court order barring Truong and Polgar from running for election. Plaintiff seeks a court order removing Joel Channing and Bill Goichberg from the Executive Board of Directors of the United States Chess Federation. Plaintiff seeks the removal of Bill Hall from his position as Executive Director of the United States Chess Federation for financial irregularities and other grounds. Plaintiff seeks damages in the amount of twenty million dollars plus punitive and exemplary damages.

THE PARTIES

10. Sam Sloan ("Sloan"), whose full name is Samuel Howard Sloan, is a member of the United States Chess Federation and has been a member for 51 years since 1956. Sloan was elected to the Executive Board of the United States Chess Federation in 2006 but was defeated when he ran for re-election in 2007. Sloan is one of the best known chess journalists in the world for his investigative reports and his newspaper and magazine articles and more recently for his Internet postings and website. In the 1970s, Sloan was a registered broker-dealer making markets in over-the-counter stocks and bonds. In legal

circles, Sloan is best known for about 20 published and reported decisions involving federal securities laws. (However, Sloan is NOT the Sloan of Sloan vs. New York Stock Exchange. He is only the Sloan of Sloan vs. SEC.) Sloan is presently a book publisher and is CEO and President of Ishi Press, a book publishing company headquartered in Japan with a branch in the US. Sloan resides at 1664 Davidson Avenue, Apt. 1B, Bronx NY 10453, tel. 917-507-7226, email address is samsloan@samsloan.com .

11. The United States of America Chess Federation ("USCF") is a Not-For-Profit 501(c)(4) corporation that was incorporated in Illinois on December 27, 1939. Although an Illinois corporation, it has never had an office in Illinois. The USCF office was located at 80 East 11th Street, New York, New York 10003 until 1967 when it moved to Newburgh NY and later to New Windsor NY. There, it maintained an office until 2006. It moved its principal office to Crossville Tennessee in about March 2005 and closed its New Windsor office in early 2006. The USCF is governed by a seven-member volunteer elected Executive Board who hires a paid Executive Director. The USCF has 23 paid employees in Crossville Tennessee and four paid consultants elsewhere. Revenues are \$3.2 million per year. Most revenues come from membership dues and rating fees, plus running national scholastic championships. The biggest profit center is the National Elementary Championship, in which as many as 4,000 children compete and earns a profit of as much as \$150,000 annually. The principal asset of the USCF is the "Life Membership Assets" or LMA which are funds that are supposed to be set aside when a new Life Member joins and pays \$1000 life membership dues. In 1999, the LMA had \$2 million mostly invested in mutual funds. The USCF lost \$2 million from 1999 through 2003 mostly due to mismanagement but possibly due to fraud and theft while George DeFeis and Frank Niro were executive directors during that period. The USCF books and records are in such bad condition that nobody really knows where the money went. It is only known that it used to have \$2 million and it does not have it any more. The address is United States Chess Federation, PO Box 3967, Crossville, Tennessee 38557-3967.

12. The USCF has 86,000 members of which the largest group are scholastic members, age 12 and under. The USCF has 23,000 scholastic members, 4,000 economy scholastic members and 5,000 family members of which about half are of scholastic age, for a total of about 30,000 members age 12 and under. It also has 6,000 youth members age 15 and under, 9,000 young adult members age 24 and under, 20,000 adult members, 10,000 life members and 600 prison members. The average, median or largest group of USCF members is 10 years old. After these members pass age 16, they almost all drop out but then re-join again at age 36 when their kids are ten years old.

13. The United States Chess Federation is the official origin of chess in the United States, recognized by FIDE, the World Chess Federation. The USCF holds the United States Chess Championship, the US Woman's Championship, the US Open Championship, the National Elementary Championship, The National Junior High School Championship, the National High School Championship, the US Junior Championship and other national events. It qualifies representatives to play for the World Chess Championship. It sends teams every two years to compete in the World Chess Olympiad. It sends representatives to compete in the World Youth Championships, World Junior Championship and Pan American Youth Championships. It publishes "Chess Life" magazine and "Chess Life for Kids" magazine. It rates chess players under the USCF rating system with a range in ratings from 2800 down to 100. It awards titles of Senior Master, Master, Expert, Class A, B, C, D and E (but not grandmaster, which is a FIDE title). There are more than 600,000 players in the USCF ratings database, almost all of them being present or former USCF members. It operates an Internet forum, the most important section being the "USCF Issues" Forum, in which adult USCF members may post opinions on a variety of USCF topics.

14. Zsuzsanna "Susan" Polgar, also known as Zsuzsa Polgar ("Polgar"), is one of the strongest chess

players in the world. Her FIDE rating is 2577 which puts her at about number 200 in the world overall. Her USCF rating is 2597 which, if she were active, would make her the number 21 rated chess player in the United States. Her history is remarkable. Born on April 19, 1969 in Budapest, Hungary, by age 13 she was already one of the top women players in the world. By age 14, she was easily the strongest woman chess player in the world. She had the highest rating in the world with 2430 and was rated 50 points higher than the official Woman's World Champion, Maya Chiburdanidze of the Republic of Georgia. She would almost without doubt have competed for and won the woman's world championship except that her father refused to allow her to compete for that title because he was opposed on principle to "Women's Chess". This started tremendous battles between Zsuzsa, her bull-headed father, Laszlo, and the Hungarian Chess Federation, with the Hungarian Chess Federation trying by every possible means to force her father to let her play for the world chess championship, because the Hungarian authorities knew that Zsuzsa would win the World Championship for the pride and patriotism of the Nation of Hungary, if only they could force Zsuzsa to sit down at the board and play chess. The Hungarian authorities even tried to put Laszlo Polgar in prison as a way to force Zsuzsa to play chess and also because he was not allowing her to go to school either. The President of the Hungarian Chess Federation was Sandur Serenyi, who was a close personal friend and former Communist cellmate of Kadar, the President of Hungary, and they put pressure on Zsuzsa and her father in every possible way because they knew that Zsuzsa would beat Chiburdanidze and win the World Championship for Hungary, if only they could force her to play. Nevertheless, Laszlo Polgar stood his ground and for that reason Zsuzsa never competed for the Woman's World Championship until she reached the legal age of 21 and her father could no longer control her. Zsuzsa never went to school and has had no formal education, except for a brief stint as an adult at a special sports college in Minsk, USSR.. Her father made her play and study chess 10 hours a day from age 4 until adulthood. She is often featured on TV and in the public media for her fantastic chess playing abilities, including most recently the BBC program entitled "Make Me a Genius".

15. Zsuzsa finally did win the Woman's World Championship in 1996 by virtually wiping out the opposition while playing as an American, not as a Hungarian. However, by then she had already spent at least seven years of her life fighting battles against the Hungarian Chess Federation. She then started fighting similar battles against FIDE, the World Chess Federation, and later against the United States Chess Federation. FIDE striped her of her World Championship title in 1999 for refusing to defend it on various pretexts, although she actually wanted two million dollars, whereas FIDE was only willing to put up \$100,000, which they were getting from the Chinese. Zsuzsa wanted her World Championship match with Xie Jun postponed to September 1999 because this was the height of the dot-com era and a company had filed a S-1 registration statement with the SEC to go public with, among other things, the Polgar-Xie Jun Match. This might seem like a silly idea but a lot of more silly ideas went public during that era. However, the dot-com bubble burst, the company never went public and Zsuzsa never got the \$2 million. Zsuzsa effectively retired from chess in 1992, later started playing again just to win the Woman's World Championship, then retired again in 1996 and since then for the last 11 years has played in only two official FIDE rated tournaments, both of which were held in 2004. Otherwise, she has confined herself primarily to paid celebrity appearances and exhibitions.

16. In spite of the fact that her real accomplishments are considerable, Zsuzsa has the unfortunate tendency to exaggerate her achievements and to falsely state that she achieved things that she has not achieved. For example, she often refers to herself or has others in her entourage refer to herself as "The World Chess Champion". After FIDE stripped her of her title in 1999 for refusing to defend it, Zsuzsa sued FIDE for the restoration of her title. In 2001, FIDE settled the suit by paying her \$25,000 which equaled her attorneys fees but refused to restore her title. Zsuzsa apparently considers that she still has the title. She often has it said that she "Won the Woman's World Championship four times". This is

nonsense as she only won it once although admittedly she probably would have won it four times if her father had allowed her to play. She states that she has been in the top three women in the world for the past 15 years. This is another nonsense claim as she has not even been on the world ranking list except for one year in the last 11 years due to inactivity, plus there are several Chinese and one Indian woman of her caliber nowadays who might be able to beat her if she played. She claims to have been the first woman to qualify for the Overall (or "Men's") World Championship cycle. This too is nonsense as Pia Cramling was the first to play for the Overall title and Susan has never played for the official FIDE Overall World Title. She has the odd habit of describing everything he does in grandiose terms and naming everything she does after herself, such as the "Susan Polgar World Open Championship for Girls" which drew a grand total of 41 mostly weak players. Polgar is presently a faculty member of Texas Tech University in Lubbock, Texas, where she resides. Her address is c/o Texas Tech University, Box 45080, Lubbock, Texas 79409-5080.

17. Hoainhan "Paul" Truong ("Truong"), born in June 1965 in South Vietnam, makes so many fantastic and unbelievable claims about himself that it has proven impossible to determine what the truth is. He claims to be a boat person who came to America as a refugee, to have refused a seat on the last helicopter out of Vietnam, to have won 11 national chess championships and 120 chess tournaments, and that after arriving in America as a penniless refugee to have risen to the top and to have become a captain of industry, to have rescued and saved many billion dollar companies, and to have made millions for himself, so that he was able to retire at age 32. He also has claimed to have a PhD degree, but he has withdrawn that claim. He has refused to provide a verifiable resume or any verifiable information about the companies he worked for and rescued. Detractors say that none of his claims are true, that he did business under the name of "Paul Derazza", sold Florida land to retired New Yorkers at inflated prices, made a lot of people angry and was strongly urged by associates of people he had swindled to retire or else. Detractors also say that both he and Susan Polgar have been expelled for computer cheating from several Internet chess playing servers, including the Internet Chess Club ("ICC") and US Chess Live. Plaintiff has no idea which of these claims are true and which are not, because all of these claims, both positive and negative, have proven to be unverifiable. Although Truong claims to have won 11 national chess championships and to have been a "media sensation" in Vietnam, the Vietnam Chess Association says that he was a player there but that he never won a national chess championship of that country. Similarly, there is no record of him ever having won a national chess championship in the United States either. He is a master strength chess player, although he rarely plays in tournaments. He once lost a tournament chess game to Plaintiff. Truong is presently a faculty member of Texas Tech University in Lubbock, Texas, where he resides. His address is c/o Texas Tech University, Box 45080, Lubbock, Texas 79409-5080.

18. Polgar and Truong became associated together starting in 2002, while getting a divorce from her husband, Jacob Shutzman, but until recently have denied any romantic involvement, insisting that their relationship was purely business, with Truong being the "business manager" of Polgar. When they announced in December 2006 that they were both running for election to the USCF Executive Board, they continued to maintain that their relationship was entirely business. At about the same time, rumors started to circulate that they were actually married to each other. While they conducted their election campaign on the USCF Issues Forum, they were asked many times whether they were married or not. Every time this question was asked they complained to the moderators and got the question deleted. Their six campaign statements in Chess Life magazine contained no mention of them being married to each other. Thus, they were able to campaign for and to win election to four year terms on the USCF Executive Board by fraudulent means in that the general membership was never informed that they were married to each other. This charade unraveled when a newspaper reporter in Lubbock, Texas reported that they were married to each other. After considerable delay, Susan eventually acknowledged

this relationship on her website in late May, 2007. It still remains unknown when and where they were married to each other or how long they have been married.

19. Polgar and Truong are followed by an entourage of supporters and sycophants who have become known as "Polgarites" or the "Polgaristas". They are opposed by others known as the Contra-Polgaristas. Internet battles are being waged daily between the Polgaristas and the Contra-Polgaristas, sweeping across various Internet forums and even the Wikipedia encyclopedia. Although outnumbered, the Polgaristas seem to be winning because several of them have been appointed as moderators of the USCF Issues Forum which gives them the power to delete any negative comments about Polgar. As a result, Polgar has become known by various euphemisms including "The Name that One Dare Not Speak", "S.ome P.oor S.oul" and "Chairman Susan". Polgar has responded with demands that the USCF Issues Forum be shut down or that the "trouble makers" be "permanently banned". On September 14, 2007, Susan wrote to the other board members:

From: SusanPolgar@xxxxxxx
Date: Fri, 14 Sep 2007 23:01:25 EDT
Delivered-to: USCF BINFO System

We need a prompt system with as little bureaucracy as possible. Once a system is in place and the trouble makers are properly sanctioned including permanent banning, there will be no problem with the forum. 99% of the problems are caused by less than 10 people.

Best wishes,
Susan Polgar

www.SusanPolgar.com
www.SusanPolgar.blogspot.com
www.SusanPolgarFoundation.org

20. Joel Channing is a controversial real estate developer in Palm Beach Gardens, Florida, where he resides. In 2002 and 2003 he organized a bid to move the USCF Headquarters from New Windsor, New York to Palm Beach Gardens. The bid was awarded and the move approved and announced. Then, some months later, John McCrary, then USCF President, announced that the USCF was moving to Crossville, without even consulting or notifying the Palm Beach Gardens group. Later, the Crossville proposal was dropped but was reinstated in 2004 after the Crossville City Attorney threatened to file suit if the USCF did not move there. Angered by these shenanigans, Joel Channing decided to run for election. He was elected to the USCF Executive Board for a four-year term in July 2005 in a hotly contested election in which all of the candidates who supported the move to Crossville were defeated. He took office in August 2005. As he had been opposed to the move to Crossville, it was assumed that he would cancel the move, but instead after he took office as VP of Finance he went ahead with the completion of the move and the construction of a new \$650,000 USCF building there. He has since become known for his bullying tactics, demanding changes in the USCF accounting system, yelling and screaming a lot during closed sessions of the board, and for once reaching under the table during a USCF board meeting and putting his hand on the thigh of an attractive female board member, who immediately rebuffed his advances. He is now a strong supporter of Polgar and is considered to be a Polgarista. He sought to make Polgar the president but could not get enough votes. His address is 5520 PGA Blvd., Suite 200, Palm Beach Gardens, Florida 33418.

21. In 2005, while a candidate for USCF Election, Channing filed a civil suit for libel and slander

against a rival real estate developer and former business partner in Palm Beach Gardens Florida after the rival had posted on the Chess Politics newsgroup that Channing had a "terrible reputation" in Florida and cared nothing about chess. This suit was reported in the Palm Beach Gardens Post. Channing has made threats to sue chess personalities, including a threat to sue former Chairman of the Finance Committee and CPA Stan Booz. After winning election, Channing demanded that the USCF take out "Internet insurance" at a cost of \$11,000 to protect board members from criticism on the USCF Forums so that moderators could remove criticisms of board members from the USCF Forum without being sued. Channing apparently believes that this Internet insurance will allow him to sue critics including especially Sam Sloan and to collect since he assumes that Sloan has no money. Channing often expresses the need to get rid of Sam Sloan in BINFOS to the other board members. (BINFOS are private emails between board members and stands for "Board Information".)

22. William Goichberg is President of the United States Chess Federation and is THE BIGGEST CHESS ORGANIZER IN THE WORLD. He also plays the horses. For example, his 35th Annual World Open held June 30-July 4, 2007 offered \$400,000 in prizes, with \$280,000 guaranteed. No other chess tournament in the world comes close to this. Goichberg resides in Arcadia, California near the Santa Anita Race Track when the horses are running and in New York when the Mets are playing and spends the rest of his time moving about the country organizing and running his big money chess tournaments, the biggest of which are the Foxwoods Open, the Chicago Open and the North American Open. His address is US Chess, PO Box 3967, Crossville, Tennessee 38557-3967.

23. Bill Hall is Executive Director of the United States Chess Federation and resides in Crossville, Tennessee. He was hired in June 2005 after the move to Crossville. Prior to being hired, his work experience consisted of being a substitute teacher of high school physics and a door-to-door salesman of Amway Products. He once attended MIT. He had never worked in a corporate office prior to being hired as Executive Director of the USCF. He is a strong, expert-rated chess player and has a congenial "nice guy" personality but, in the opinion of plaintiff, has proven himself to be utterly incompetent and totally worthless as an Executive Director of the USCF, an opinion that is shared by Beatriz Marinello who originally hired him, and many others. His address is c/o United States Chess Federation, PO Box 3967, Crossville, Tennessee 38557-3967.

24. Herbert Rodney Vaughn resides in Kentucky after previously residing in Chicago. His address is 1154 Duncan Ridge Road, Lewisburg, KY 42256. He first became to the attention in the world of chess in 2006 by writing hundreds of articles on the Internet attacking Sam Sloan under the anonymous screen name of Tanstaafl, while Sloan was running for election. He repeatedly refused to reveal his actual identity when asked. After Sloan was elected anyway, he organized and became the leader of a group determined to overturn the election results and to stop or prevent Sloan from taking office on the board. He came to the USCF delegates meeting in Chicago held August 13-14, 2006 and without revealing his identity as "tanstaafl" claimed to be a Delegate from the State of Ohio and, because nobody was paying attention or knew who he was, managed to get seated as a delegate. He then proceeded to tie up the delegates meetings with motions directed to stopping Sloan from taking office or getting him removed from office. He tried to get the delegates to refuse to certify the results of the election and after learning both that there was insufficient support for that idea and that USCF Counsel Michael Matsler had advised that a refusal to certify the election results would be ineffective anyway, Vaughn got passed a by-laws change making it easier to recall or remove an elected board member. Addressing the well-known fact that in 1992 Sloan was convicted in a child custody case in Virginia involving his daughter Shamema (the case is reported on Lexus-Nexus. Be sure to look at the 6-3 Virginia Court of Appeals Decision in which the opinion of the three dissenting judges makes it obvious that Sloan was not guilty.). Vaughan moved a by-laws change that a "convicted felon" may not

serve on the board. The delegates modified this motion to say that the convicted felon must disclose his conviction in the candidates statement published in Chess Life and is given 100 extra words to do so. The end result of all these efforts by Vaughan to stop Sloan from taking office was that they failed although two of his motions passed. After the delegates meeting was concluded and the new board took office, the new board passed a rule that all posters to the USCF Forums must reveal their USCF ID number so that anonymous posters are not allowed. This became known as the "Herbert Vaughn Rule" because through this rule it was revealed that Herbert Vaughn was the same person as tanstaafl. Vaughn then proceeded to file a 400 page ethics complaint against Sloan in color in which he complained about among other things the Herbert Vaughn Rule. Eleven of the 16 Counts in the Vaughn Ethics Complaint were dismissed by the USCF Ethics Committee on the grounds of no jurisdiction, one was dismissed on the merits and the remainder are pending on appeal.

25. Knowing the overt hostility of Vaughn towards Sloan, Bill Hall appointed Vaughn as a moderator of the USCF Forums, giving Vaughn the power to remove from public view any posting. Vaughn has proceeded to remove from public view more than one thousand postings by USCF members, not only by Sloan. Almost every posting even mildly critical of members of the USCF Executive Board or of Bill Hall have been removed from public view. In theory, there is a "Forum Oversight Committee" or "FOC" with the power to restore postings but most members of the FOC have resigned, citing pressure from board members to remove any posting critical of them. They are resigning because of pressure from members of the Executive Board to ban certain posters and because of threats by certain members of the Executive Board to shut down the USCF Forums altogether. Here is an example posted at the time of his resignation by Wayne Praeder at:

<http://members.aol.com/wpraeder/bbs.htm>

<http://members.aol.com/wpraeder/newaug.htm>

"Board Member Intermediation

"There seems to be a considerable amount of posting as well as correspondence from our leadership and technical support staff expressing their various opinions on what is appropriate or not appropriate regarding the forum. The impact of this intermediation with the membership is noticeable.

"I did want to express concern about board members expressing displeasure with various posts or moderator actions and suggesting also that comments referring to themselves or their colleagues be removed. This has been exacerbated by requests to ban others from the forums. This action combined with various comments from our leadership about shutting down the forums lends a chilling effect to the process and contributes to dysfunctional forum moderation.

"Even if our leaders are hyper-sensitive to criticism they need to be models of decorum for all of us and be prepared to productively answer critics and not suppress them. Improving organizational behavior must start at the top. The USCF must have those who represent it to lead by example. Note personal attacks should not be allowed but the idea is not to stifle criticism, debate, or even disagreement as one can have polite discourse and still challenge others' points of view, their record, their statements, their actions, their behavior, and their opinions.

"The Forum Oversight Committee

"I understand all this intermediation by our leaders should not influence FOC actions but it does as such behavior encourages individual and arbitrary interpretation of the AUG that the forum members all have agreed to follow. In my opinion this arbitrariness, interestingly enough, also empowers what the leadership labels disrespectfully as malcontents as well as provides a rationale for those in authority not to maintain their public accountability."

26. Tragically, one forum moderator committed suicide on September 2, 2007. The reasons for his suicide are not known, but he called plaintiff just two days before he died and expressed deep concern about threats that were being made to sue him. Duncan Oxley of Marina, California was a long time friend of plaintiff and had several times reinstated postings that had been pulled by Vaughn. Oxley also had been a moderator for seven years on both ICC and US ChessLive and had been involved in suspending Polgar and Truong from these chess playing sites for computer cheating.

27. Gregory Alexander is a full-blown Polgarista. He resides in Seattle, Washington. His address is 8416 Monte Cristo Drive, Everett, WA 98208. He is a new member of the USCF having joined just recently and played his first rated game of chess only last month. In spite of his lack of knowledge of chess and chess players, he was appointed as a member of the FOC for the obvious purpose of deleting any negative comments about Polgar. Soon thereafter, he was moved down to the even more sensitive position of moderator. He soon got into raging battles with the other moderators and the FOC. Often he would remove a posting and another moderator such as Duncan Oxley or Mike Aigner would reinstate it. Then, when the FOC ordered a posting reinstated, Gregory Alexander would remove it a second time. Finally, he resigned after a brief but tumultuous time as moderator, because the FOC was in the process of voting to censure and sanction him for disobeying their orders to restore posts. He then went public with attacks on the other moderators and the FOC. He has set up and established a copycat forum at <http://www.chessdiscussion.com> on behalf of Polgar and Truong that looks so much like the USCF Forum with the same design, colors and layout as to confuse readers into believing that they are looking at the original. Gregory Alexander has been viciously attacking the system administrators who discovered and proved that Polgar and Truong are one and the same as the Fake Sam Sloan and the Fake Ray Gordon.

28. Frank Niro was USCF Executive Director from 2001 to 2003. He was a well-liked and congenial guy who was liked especially by Plaintiff. However, in August 2003 he suddenly disappeared and soon thereafter it became apparent that he was a big crook. The circumstances of his disappearance were that he had been reporting that the USCF had a \$300,000 surplus for the 2002-2003 fiscal year. He walked out the door of the USCF offices after writing himself a check for \$3000 for expenses, supposedly on his way to Los Angeles, never to be seen again. Frank Niro simply disappeared. A few days later in the middle of the Finance Committee Workshop in Los Angeles a Federal Express arrived with the audited financial statements. The USCF Treasurer, Frank Camaratta, opened the package proudly thinking it would show a \$300,000 surplus only to discover that it showed a \$300,000 deficit. This startling development caused USCF President John McCrary to resign. Camaratta subsequently resigned as well. Beatriz Marinello, elected to be a hapless and beautiful wallflower, to everyone's shock and surprise, suddenly became USCF President. On August 20, 2003, she walked in the USCF Offices in New Windsor NY and, realizing that the USCF could no longer make payroll, fired 17 long standing staff members on the spot, reducing the staff from 40 to 23. She noticed that the USCF's laptop computer on which all the financial records were recorded was missing but had no idea what had happened to it.

29. Four years later, Frank Niro appeared on the Internet with his own website at <http://www.chesssafari.com>. The website was taken down shortly thereafter. Turns out that after

disappearing in August 2003, Niro had gone into hiding in Polgar and Truong's building in Forest Hills, Queens. Niro publicly thanked Polgar and Truong from recovering the laptop computer from the USCF offices and bringing it to him. After questioning all witnesses, the following facts have emerged. After the USCF Delegates meeting in Los Angeles, Mike Nolan was placed in charge of the New Windsor office. However, an emergency in Nebraska where he resided had caused him to resign only a few days later. On the morning of August 20, 2003 he left the USCF offices after observing that the laptop computer was sitting on Frank Niro's desk (Niro having not resigned but simply disappeared). As Nolan was walking out the door, he observed Paul Truong and Susan Polgar walking past him in the door. A few minutes later Beatriz Marinello arrived with her new VP of Finance Tim Hanke. Polgar and Truong were no longer there. In other words, Polgar and Truong stole the laptop computer.

30. Polgar and Truong have since admitted that they took the laptop computer. However, they claimed that they had permission to do so. However, all witnesses and all persons involved have been questioned and nobody gave them permission to take the computer which would have contained the data to determine what happened to the missing \$600,000 and possibly what happened to the entire \$2 million that the USCF lost from 1996 to 2003. Plaintiff while on the board has repeatedly demanded the return of the laptop computer and Polgar, Truong and presumably Niro have refused to return it. (Please note that corporate records are required by law to be kept and preserved for seven years. Thus, if Polgar, Truong or Niro have erased or disposed of that laptop computer, they have committed a crime.) Niro reportedly now resides in the Seattle, Washington area and Polgar and Truong have visited him there recently. His exact address is unknown, as he is still hiding out. His mailing address is c/o Delilah Rene Luke, KRWM, 3650 131st Avenue SE, Suite 550, Bellevue, WA 98006.

31. After Plaintiff took office on the USCF Executive Board after winning the 2006 election, he demanded and eventually received a CD showing all the checks received and paid since 2001. This CD showed checks for huge amounts of money (by chess standards) being paid to various Polgar entities including Susan Polgar, Inc. Polgar Chess Authority, Susan Polgar Foundation and Susan Polgar herself. These checks total around \$50,000 which is a lot of money especially since Polgar seems to have done little or nothing to deserve them. No explanation has been provided as to what these checks are for. The 990 Form filed with the IRS shows that Frank Niro formed the Susan Polgar Foundation, Inc. as a not-for-profit corporation while Niro was Executive Director of the USCF. Frank Niro remains a trustee of the Susan Polgar Foundation to this day. This, checks signed by Niro paying money to the Susan Polgar Foundation were essentially checks paid to himself, an obvious violation of conflict of interest. No member of the board was ever informed of this until it was discovered in late 2006 while Plaintiff was on the board.

32. In March, 2003, Frank Niro representing the USCF secretly signed a contract with Polgar and Truong, under which among other things the USCF would put up \$50,000 and Polgar and Truong would provide "training" for the 2004 United States Woman's Team to be sent to the World Chess Olympiad in Spain. This contract was ridiculous as the USCF was tottering on the brink of bankruptcy and did not even have money to send a team Calvia, Spain to play, much less \$50,000 to train one. This contract was kept top secret from the board and was not known until it was discovered months after Frank Niro had disappeared. The USCF subsequently reached a settlement with Polgar in 2006 and paid her \$20,000. It appears that monthly pictures of Polgar that were published in Chess Life magazine in every issue in 2006 was part of a settlement, especially since Polgar played in only one chess tournament that entire year and that was an unofficial event organized by herself. (Polgar was paid double, as the Kasparov Chess Foundation also paid her.)

33. In October, 2003, after Frank Niro had disappeared and Grant Perks had taken over as executive

director, Polgar and Truong sent an invoice demanding payment of \$17,000, mostly for celebrity appearance fees. None of these appearance fees had been authorized by the board, nor did the board even know about them. Grant Perks was instructed by the new VP of Finance Tim Hanke, "Don't pay them a penny". Accordingly, Grant Perks did not pay. Grant Perks was fired shortly thereafter (although he claims that he quit before they could fire him) and Bill Goichberg took over as volunteer executive director. In December, 2003, Goichberg secretly paid Polgar \$13,358.36. This payment was kept secret until Plaintiff discovered it in November, 2006, three years later. In a board meeting in Stamford, Connecticut, on November 17-18, 2006 Beatriz Marinello informed the board that she had been USCF President at that time and that she had not known and would not have agreed to this payment to Polgar of \$13,358.36.

34. Grant Perks is a Ohio CPA residing in Bexley, Ohio. He is currently Chairman of the Finance Committee and a member of the Audit Committee of the USCF. He was Executive Director of the USCF for three months in August to November 2003 and Chief Financial Officer of the USCF from January to May 2005. It has been reported that he was fired both times but he claims that he quit. He is a cover-up guy, consistently trying to stop the discovery of any inside financial information about the USCF. For example, he juggled the books so that a reported loss of \$57,915 for the fiscal year ending May 31, 2007 was converted to a \$3,000 surplus by the time the delegates met in August, 2007. Perks ran for USCF election in 2006 and was defeated by Sloan. After losing the election, Perks tried to overturn the election results by filing an ethics complaint hoping that the Ethics Committee could vacate the results. Perks even advocated changing the by-laws by eliminating the Executive Board altogether so that Sloan could not take a seat on the board. These efforts were unsuccessful. At the delegates meeting on August 12, 2006 in Oak Brook, Illinois, Perks left a note with Pat Knight, Assistant USCF Executive Director, purporting to appoint Herbert Rodney Vaughn, Paul Troung and William Brock as delegated from Ohio, although none of them lived in Ohio. All three of these individuals were known to be vehemently hostile to Plaintiff and the purpose of these purported appointments was to stop Plaintiff from taking office or to remove Plaintiff from office shortly after taking office. Plaintiff contends that these appointments were ineffective and a violation of the USCF by-laws and the two anti-Sloan by-law amendments sponsored and voted in by these purported delegates are null and void, especially since Perks did not attend the delegates meeting but left before the meeting had started. (Although made a "delegate" by Perks, Brock did not take a seat as a delegate because he had just resigned his USCF membership in protest to the election of Sloan.) The address of Grant Perks is 391 South Gould Road, Columbus Ohio 43209.

35. William Brock is a Chicago CPA residing in Chicago. Brock is Past Chairman of the Audit Committee of the USCF, Past Chairman of the Finance Committee of the USCF and Past President of the Illinois Chess Association. For unknown reasons Brock has an obsessive compulsive need to attack Sloan ten times a day. Every day for more than three years since 2004, Brock has called Sloan a child molester, a pedophile and a purveyor of kiddie-porn and Poke-Porn. Nobody seems to know why Brock does this although one theory relates to the fact that Pokemon has a cartoon character named "Brock". The claims by Bill Brock that Sloan is a pedophile pornographer and so on have no basis in fact, yet he keeps making these claims. He stalks Sloan on the Internet and follows him around. For example, if Sloan posts on the ChessNinja site, Brock will come behind him and post there too. The same thing for Wikipedia and every other site. Brock seems to be a sick man, as there is no other explanation for this behavior. This spectacle has been so remarkable that a peanut gallery of spectators follows them around. In June, 2005 a group of these spectators got together and put up \$1000 cash for Sloan to play a Grudge Match against Brock. Even though Sloan was the underdog since Brock was rated more than 100 points higher, Sloan agreed to fly to Chicago and play the match in Brock's CPA office in the Chicago Loop. The match was refereed by now disgraced Arbiter Larry Cohen. Among the spectators